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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

DANIEL COHEN,
Plaintiff,
vs.
LOS ANGELES COUNTY, et. al.,
Defendants.

) Case No. 2:15-CV-03576 JAK
) (AGRx)
) **[Complaint Filed: 5/13/15]**
)
) **DEFENDANT COUNTY OF LOS
ANGELES' RESPONSES TO
PLAINTIFF DANIEL COHEN'S
REQUEST FOR PRODUCTION
OF DOCUMENTS**
)
) **(SET THREE)**
)

PROPOUNDING PARTY: PLAINTIFF DANIEL COHEN

RESPONDING PARTY: DEFENDANT COUNTY OF LOS ANGELES

SET NO.: THREE

TO: PLAINTIFF DANIEL COHEN AND TO HER ATTORNEYS OF RECORD
HEREIN:

1 Defendant COUNTY OF LOS ANGELES hereby responds as follows to
2 Plaintiff's Request for Production of Documents (Set Three):

3 **INTRODUCTORY STATEMENTS AND GENERAL OBJECTIONS**

4 1. Defendant COUNTY OF LOS ANGELES responses to Plaintiff DANIEL
5 COHEN'S Request for Production of Documents, Set No. Three, are made to the
6 best of the current present knowledge of its employees and agents and where
7 indicated, on information and belief. The responses are subject to such additional or
8 different information that discovery or further investigation may disclose and, while
9 based on the present state of recollection of cross-complainant's employees and
10 agents, is subject to such refreshing of recollection, and such additional knowledge
11 of facts, as may result from further discovery and investigation. Defendant reserves
12 the right to make use of, or to introduce at any hearing and at trial, documents and
13 information responsive to plaintiff's Request discovered subsequent to the date of
14 this Response, including but not limited to, any such information or documents
15 obtained in discovery herein.

16 2. To the extent any item of the Request seeks information contained in
17 documents protected from disclosure by the attorney-client privilege and/or attorney
18 work product doctrine, defendant declines to provide such information, including
19 but not limited to the following:

20 a. All **DOCUMENTS** constitute or record the correspondence or

other communications between employees and/or agents of defendant and defendant's counsel and/or agents regarding this action;

b. All **DOCUMENTS** prepared for use in this action, including notes, memoranda, draft pleadings, and correspondence prepared by, at the direction of, or for the review of counsel for defendant;

3. Defendant reserves all objections or other questions as to the competency, relevancy, materiality, propriety, privilege, or admissibility as evidence in any hearing and at trial or other proceeding in this or any other action, for any purpose whatsoever, of any statement contained herein or any documents produced.

4. Except for the explicit facts admitted herein, no incidental or implied admissions are intended hereby. The fact that this responding party has answered or objected to any request or any part thereof, should not be taken as an admission that it accepts or admits the existence of any facts set forth or assumed by such request or that such answer or objection constitutes admissible evidence.

RESPONSE TO REQUEST FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 148:

Any and all documents prepared by Defendant Deputy Shah explaining why he cancelled Daniel Cohen's medical appointment on or about April 25, 2014.

RESPONSE TO REQUEST NO. 148:

Objection. This Request is vague, ambiguous, and overbroad. Responding Party further objects to this Request as irrelevant to this litigation and not

1 proportional to the needs of the case. Additionally, this Request is unduly
2 burdensome because numerous documents may tangentially refer to this Request.

3 Notwithstanding the aforementioned objections, Responding Party has
4 conducted a diligent search and made a reasonable inquiry and has determined that
5 there are no responsive documents in its possession, custody or control. Discovery
6 and investigation are continuing.

7

8 **REQUEST FOR PRODUCTION NO. 149:**

9 Any and all documents explaining why Defendant Deputy Shah cancelled Daniel
10 Cohen's medical appointment on or about April 25, 2014.

11

12 **RESPONSE TO REQUEST NO. 149:**

13 Objection. This Request is vague, ambiguous, and overbroad. Responding
14 Party further objects to this Request as irrelevant to this litigation and not
15 proportional to the needs of the case. Additionally, this Request is unduly
16 burdensome because numerous documents may tangentially refer to this Request.

17 Notwithstanding the aforementioned objections, Responding Party has
18 conducted a diligent search and made a reasonable inquiry and has determined that
19 there are no responsive documents in its possession, custody or control. Discovery
20 and investigation are continuing.

21

22 **REQUEST FOR PRODUCTION NO. 150:**

23 Any and all Los Angeles County Sheriffs Department's Orders regarding Daniel
24 Cohen being transferred to LAC+USC for medical treatment on April 25, 2014.

25

26 **RESPONSE TO REQUEST NO. 150:**

27 Objection. This Request is vague, ambiguous, and overbroad. Responding
28 Party further objects to this Request as irrelevant to this litigation and not

1 proportional to the needs of the case. Additionally, this Request is unduly
2 burdensome because numerous documents may tangentially refer to this Request.

3 Notwithstanding the aforementioned objections, Responding Party has
4 conducted a diligent search and made a reasonable inquiry and has determined that
5 there are no responsive documents in its possession, custody or control. Discovery
6 and investigation are continuing.

7

8 REQUEST FOR PRODUCTION NO. 151:

9 Any and all documents prepared by Defendant Deputy Shah explaining why he
10 cancelled Daniel Cohen's medical appointment on or about August 2, 2013.

11

12 RESPONSE TO REQUEST NO. 151:

13 Objection. This Request is vague, ambiguous, and overbroad. Responding
14 Party further objects to this Request as irrelevant to this litigation and not
15 proportional to the needs of the case. Additionally, this Request is unduly
16 burdensome because numerous documents may tangentially refer to this Request.

17 Notwithstanding the aforementioned objections, Responding Party will
18 produce all non-privileged, responsive documents in its possession, custody or
19 control.

20

21

22 REQUEST FOR PRODUCTION NO. 152:

23 Any and all documents explaining why Defendant Deputy Shah cancelled Daniel
24 Cohen's medical appointment on or about August 2, 2013.

25

26 RESPONSE TO REQUEST NO. 152:

27 Objection. This Request is vague, ambiguous, and overbroad. Responding
28 Party further objects to this Request as irrelevant to this litigation and not

1 proportional to the needs of the case. Additionally, this Request is unduly
2 burdensome because numerous documents may tangentially refer to this Request.

3 Notwithstanding the aforementioned objections, Responding Party has
4 conducted a diligent search and made a reasonable inquiry and has determined that
5 there are no responsive documents in its possession, custody or control. Discovery
6 and investigation are continuing.

7

8 **REQUEST FOR PRODUCTION NO. 153:**

9 Any and all Los Angeles County Sheriff's Department's Orders regarding Daniel
10 Cohen being transferred to LAC+USC for medical treatment on August 2, 2013.

11

12 **RESPONSE TO REQUEST NO. 153:**

13 Objection. Responding Party objects to this Request as irrelevant to this
14 litigation and not proportional to the needs of the case. Additionally, this Request
15 is unduly burdensome because numerous documents may tangentially refer to this
16 Request.

17 Notwithstanding the aforementioned objections, Responding Party has
18 conducted a diligent search and made a reasonable inquiry and has determined that
19 there are no responsive documents in its possession, custody or control. Discovery
20 and investigation are continuing.

21

22 **REQUEST FOR PRODUCTION NO. 154:**

23 Any and all documents prepared by Defendant Teresa Malone regarding her
24 interaction(s) with Daniel Cohen about any of his medical conditions in April
25 2014.

26

27 **RESPONSE TO REQUEST NO. 154:**

1 Objection. Plaintiff's medical records were previously requested for Request
2 No. 129 served on January 2, 2020. Defendants responded to said request on May
3 4, 2020. Defendants object to providing multiple responses to Plaintiff's medical
4 records as an improper attempt to obtain further responses. This Request is also
5 vague, ambiguous, and overbroad. Responding Party further objects to this Request
6 as irrelevant to this litigation and not proportional to the needs of the case.

7 Notwithstanding the aforementioned objections, Responding Party will
8 produce all responsive documents in its possession, custody or control.
9

10 **REQUEST FOR PRODUCTION NO. 155:**

11 Any and all documents prepared by Defendant Teresa Malone regarding her 17
12 ordering Daniel Cohen to be transferred to 7100 in April 2014.
13

14 **RESPONSE TO REQUEST NO. 155:**

15 Objection. Plaintiff's medical records were previously requested for Request
16 No. 129 served on January 2, 2020. Defendants responded to said request on May
17 4, 2020. Defendants object to providing multiple responses to Plaintiff's medical
18 records as an improper attempt to obtain further responses. This Request is also
19 vague, ambiguous, and overbroad. Responding Party further objects to this Request
20 as irrelevant to this litigation and not proportional to the needs of the case.
21

22 Notwithstanding the aforementioned objections, Responding Party will
23 produce all responsive documents in its possession, custody or control.
24

25 **REQUEST FOR PRODUCTION NO. 156:**

26 Any and all documents prepared by Defendant Teresa Malone regarding Daniel
27 Cohen threatening to hurt other inmates in April of 2014.
28

///

1 **RESPONSE TO REQUEST NO. 156:**

2 Objection. Plaintiff's medical records were previously requested for Request
3 No. 129 served on January 2, 2020. Defendants responded to said request on May
4, 2020. Defendants object to providing multiple responses to Plaintiff's medical
5 records as an improper attempt to obtain further responses. It is also vague,
6 ambiguous, and overbroad. Responding Party further objects to this Request as
7 irrelevant to this litigation and not proportional to the needs of the case.

8 Notwithstanding the aforementioned objections, Responding Party will
9 produce all responsive documents in its possession, custody or control.

11 **REQUEST FOR PRODUCTION NO. 157:**

12 Any and all documents prepared by Defendant Teresa Malone regarding her
13 authorizing Daniel Cohen to be transferred to Dorm 161 in April 2014.

15 **RESPONSE TO REQUEST NO. 157:**

16 Objection. This Request is a duplicate of request No. 154 that Defendant
17 responded to previously. It is also vague, ambiguous, and overbroad. Responding
18 Party further objects to this Request as irrelevant to this litigation and not
19 proportional to the needs of the case. Additionally, this Request is unduly
20 burdensome because numerous documents may tangentially refer to this Request.

21 Notwithstanding the aforementioned objections, Responding Party will
22 produce all responsive documents in its possession, custody or control.

28 ////

1 REQUEST FOR PRODUCTION NO. 158:

2 Any and all documents prepared by Defendant Teresa Malone regarding any
3 medical treatment or consultation that she gave to Daniel Cohen in April 2014.

4 RESPONSE TO REQUEST NO. 158:

5 Objection. Plaintiff's medical records were previously requested for Request
6 No. 129 served on January 2, 2020. Defendants responded to said request on May
7 4, 2020. Defendants object to providing multiple responses to Plaintiff's medical
8 records as an improper attempt to obtain further responses. It is also vague,
9 ambiguous, and overbroad. Responding Party further objects to this Request as
10 irrelevant to this litigation and not proportional to the needs of the case.
11 Additionally, this Request is unduly burdensome because numerous documents
12 may tangentially refer to this Request.

13 Notwithstanding the aforementioned objections, Responding Party will
14 produce all responsive documents in its possession, custody or control.

17 REQUEST FOR PRODUCTION NO. 159:

18 Any and all documents prepared by Defendant Teresa Malone regarding
19 discharging Daniel Cohen from the CTC in April 2014.

20 RESPONSE TO REQUEST NO. 159:

21 Objection. Plaintiff's medical records were previously requested for Request
22 No. 129 served on January 2, 2020. Defendants responded to said request on May
23 4, 2020. Defendants object to providing multiple responses to Plaintiff's medical
24 records as an improper attempt to obtain further responses. It is also vague,
25 ambiguous, and overbroad as to scope and substance. Responding Party further
26 objects to this Request as irrelevant to this litigation and not proportional to the
27 needs of the case. Additionally, this Request is unduly burdensome because
28 numerous documents may tangentially refer to this Request.

1 Notwithstanding the aforementioned objections, Responding Party will
2 produce all responsive documents in its possession, custody or control.
3
4

5 **REQUEST FOR PRODUCTION NO. 160:**

6 Any and all documents regarding Defendant Teresa Malone's interaction(s) with
7 Daniel Cohen about any of his medical condition(s) in April 2014.
8

9 **RESPONSE TO REQUEST NO. 160:**

10 Objection. Plaintiff's medical records were previously requested for Request
11 No. 129 served on January 2, 2020. Defendants responded to said request on May
12 4, 2020. Defendants object to providing multiple responses to Plaintiff's medical
13 records as an improper attempt to obtain further responses. It is also vague,
14 ambiguous, and overbroad. Responding Party further objects to this Request as
15 irrelevant to this litigation and not proportional to the needs of the case.
16 Additionally, this Request is unduly burdensome because numerous documents
17 may tangentially refer to this Request.
18

19 **REQUEST FOR PRODUCTION NO. 161:**

20 Any and all documents regarding the decision to order Daniel Cohen to be
21 transferred to 7100 in April 2014.
22

23 **RESPONSE TO REQUEST NO. 161:**

24 Objection. Plaintiff's medical records were previously requested for Request
25 No. 129 served on January 2, 2020. Defendants responded to said request on May
26 4, 2020. Defendants object to providing multiple responses to Plaintiff's medical
27 records as an improper attempt to obtain further responses. This Request is also
28 vague, ambiguous, overbroad, and seeks production of documents which are
protected from disclosure pursuant to the official information privilege.
Responding Party further objects to this Request as irrelevant to this litigation and

1 not proportional to the needs of the case. Additionally, this Request is unduly
2 burdensome because numerous documents may tangentially refer to this Request.
3 This Request seeks documents that contain confidential and proprietary business
4 information.

5

6 **REQUEST FOR PRODUCTION NO. 162:**

7 Any and all documents regarding Daniel Cohen threatening to hurt other inmates
8 in April of 2014.

9

10 **RESPONSE TO REQUEST NO. 162:**

11 Objection. This Request is a duplicate of request No. 155 that Defendant
12 responded to previously. It is also vague, ambiguous, overbroad, and seeks
13 production of documents which are protected from disclosure pursuant to the
14 official information privilege. Responding Party further objects to this Request as
15 irrelevant to this litigation and not proportional to the needs of the case.
16 Additionally, this Request is unduly burdensome because numerous documents
17 may tangentially refer to this Request. This Request seeks documents that contain
18 confidential and proprietary business information. Discovery and investigation are
19 ongoing.

20

21 **REQUEST FOR PRODUCTION NO. 163:**

22 Any and all documents regarding the decision to authorize Daniel Cohen to be
23 transferred to Dorm 161 in April 2014.

24

25 **RESPONSE TO REQUEST NO. 163:**

26 Objection. This Request is a duplicate of request No. 157 that Defendant
27 responded to previously. It is also vague, ambiguous, overbroad, and seeks
28 production of documents which are protected from disclosure pursuant to the
official information privilege. Responding Party further objects to this Request as

1 irrelevant to this litigation and not proportional to the needs of the case.
2 Additionally, this Request is unduly burdensome because numerous documents
3 may tangentially refer to this Request. This Request seeks documents that contain
4 confidential and proprietary business information.

5

6 **REQUEST FOR PRODUCTION NO. 164:**

7 Any and all documents regarding any medical treatment or consultation that
8 Defendant Teresa Malone gave to Daniel Cohen in April 2014.

9 **RESPONSE TO REQUEST NO. 164:**

10 Objection. This Request is a duplicate of request No. 158 that Defendant
11 responded to previously. It is also vague, ambiguous, and overbroad as to scope
12 and substance. Responding Party further objects to this Request as irrelevant to this
13 litigation and not proportional to the needs of the case. Additionally, this Request
14 is unduly burdensome because numerous documents may tangentially refer to this
15 Request.

16

17 **REQUEST FOR PRODUCTION NO. 165:**

18 Any and all documents regarding the decision to discharge Daniel Cohen from the
19 CTC in April 2014.

20

21 **RESPONSE TO REQUEST NO. 165:**

22 Objection. Plaintiff's medical records were previously requested for Request
23 No. 129 served on January 2, 2020. Defendants responded to said request on May
24 4, 2020. Defendants object to providing multiple responses to Plaintiff's medical
25 records as an improper attempt to obtain further responses. It is also vague,
26 ambiguous, and overbroad as to scope and substance. Responding Party further
27 objects to this Request as irrelevant to this litigation and not proportional to the
28 needs of the case. Additionally, this Request is unduly burdensome because

1 numerous documents may tangentially refer to this Request. This Request seeks
2 documents that contain confidential and proprietary business information.

3 Notwithstanding the aforementioned objections, discovery and investigation are
4 ongoing.

5

6 **REQUEST FOR PRODUCTION NO. 166:**

7 Any and all medical charts prepared by Defendant Teresa Malone in April 2014
8 regarding Daniel Cohen.

9 **RESPONSE TO REQUEST NO. 166:**

10 Objection. This Request is a duplicate of requests Nos. 129 and 158 that
11 Defendant responded to previously. Plaintiff's medical records were previously
12 requested for Request No. 129 served on January 2, 2020. Defendants responded
13 to said request on May 4, 2020. Defendants object to providing multiple responses
14 to Plaintiff's medical records as an improper attempt to obtain further responses.
15 This request is also vague, ambiguous, and overbroad as to scope and substance. It
16 even seeks production of documents which are protected from disclosure pursuant
17 to the official information privilege. Responding Party further objects to this
18 Request as irrelevant to this litigation and not proportional to the needs of the case.
19 Additionally, this Request is unduly burdensome because numerous documents
20 may tangentially refer to this Request. Discovery and investigation are ongoing.

22

23 **REQUEST FOR PRODUCTION NO.167:**

24 Any and all medical charts prepared by Defendant Teresa Malone in 2013
25 regarding Daniel Cohen.

26 **RESPONSE TO REQUEST NO. 167:**

27 Objection. Plaintiff's medical records were previously requested for Request
28 No. 129 served on January 2, 2020. Defendants responded to said request on May

1 4, 2020. Defendants object to providing multiple responses to Plaintiff's medical
2 records as an improper attempt to obtain further responses. This request is also
3 vague, ambiguous, overbroad, and seeks production of documents which are
4 protected from disclosure pursuant to the official information privilege.

5 Responding Party further objects to this Request as irrelevant to this litigation and
6 not proportional to the needs of the case. Additionally, this Request is unduly
7 burdensome because numerous documents may tangentially refer to this Request.

9 Notwithstanding the aforementioned objections, Responding Party has
10 conducted a diligent search and made a reasonable inquiry and has determined that
11 there are no responsive documents in its possession, custody or control. Discovery
12 and investigation are ongoing.

14 REQUEST FOR PRODUCTION NO. 168:

15 Any and all medical charts prepared by Defendant Teresa Malone in 2014
16 regarding Daniel Cohen.

17 RESPONSE TO REQUEST NO. 168:

18 Objection. Plaintiff's medical records were previously requested for Request
19 No. 129 served on January 2, 2020. Defendants responded to said request on May
20 4, 2020. Defendants object to providing multiple responses to Plaintiff's medical
21 records as an improper attempt to obtain further responses. This Request is also
22 vague, ambiguous, overbroad, and seeks production of documents which are
23 protected from disclosure pursuant to the official information privilege.

25 Responding Party further objects to this Request as irrelevant to this litigation and
26 not proportional to the needs of the case. Additionally, this Request is unduly
27 burdensome because numerous documents may tangentially refer to this Request.

1 Notwithstanding the aforementioned objections, discovery and investigation are
2 ongoing.

3

4 REQUEST FOR PRODUCTION NO. 169:

5 Any and all medical charts prepared by any current or former COLA/LACSD
6 medical staff employee in 2013 regarding Daniel Cohen.

7 RESPONSE TO REQUEST NO. 169:

8 Objection. Plaintiff's medical records were previously requested for Request
9 No. 129 served on January 2, 2020. Defendants responded to said request on May
10 4, 2020. Defendants object to providing multiple responses to Plaintiff's medical
11 records as an improper attempt to obtain further responses. This Request is also
12 vague, ambiguous, overbroad, and seeks production of documents which are
13 protected from disclosure pursuant to the official information privilege.

14 Responding Party further objects to this Request as irrelevant to this litigation and
15 not proportional to the needs of the case. Additionally, this Request is unduly
16 burdensome because numerous documents may tangentially refer to this Request.

17

18

19 REQUEST FOR PRODUCTION NO. 170:

20 Any and all medical charts prepared by any current or former COLA/LACSD
21 medical staff employee in 2014 regarding Daniel Cohen.

22 RESPONSE TO REQUEST NO. 170:

23 Objection. Plaintiff's medical records were previously requested for Request
24 No. 129 served on January 2, 2020. Defendants responded to said request on May
25 4, 2020. Defendants object to providing multiple responses to Plaintiff's medical
26 records as an improper attempt to obtain further responses. This Request is also
27 vague, ambiguous, overbroad, and seeks production of documents which are
28 protected from disclosure pursuant to the official information privilege.

1 Responding Party further objects to this Request as irrelevant to this litigation and
2 not proportional to the needs of the case. Additionally, this Request is unduly
3 burdensome because numerous documents may tangentially refer to this Request.
4 This Request seeks documents that contain confidential and proprietary business
5 information.

6

7 **REQUEST FOR PRODUCTION NO. 171:**

8 Any and all documents prepared by psychological social worker, Andrea Solis,
9 regarding Daniel Cohen's request to be housed in an area for inmates with vision
10 problems.

11 **RESPONSE TO REQUEST NO. 171:**

12 Objection. Plaintiff's medical records were previously requested for Request
13 No. 129 served on January 2, 2020. Defendants responded to said request on May
14 4, 2020. Defendants object to providing multiple responses to Plaintiff's medical
15 records as an improper attempt to obtain further responses. This Request is also
16 vague, ambiguous, overbroad, and seeks production of documents which are
17 protected from disclosure pursuant to the official information privilege.

18 Responding Party further objects to this Request as irrelevant to this litigation and
19 not proportional to the needs of the case. Additionally, this Request is unduly
20 burdensome because numerous documents may tangentially refer to this Request.

21

22 **REQUEST FOR PRODUCTION NO. 172:**

23 Any and all documents regarding Daniel Cohen's request of Andrea Solis to be
24 housed in an area for inmates with vision problems.

25 **RESPONSE TO REQUEST NO. 172:**

26 Objection. Plaintiff's medical records were previously requested for Request
27 No. 129 served on January 2, 2020. Defendants responded to said request on May
28

1 4, 2020. Defendants object to providing multiple responses to Plaintiff's medical
2 records as an improper attempt to obtain further responses. This Request is also
3 vague, ambiguous, overbroad, and seeks production of documents which are
4 protected from disclosure pursuant to the official information privilege.

5 Responding Party further objects to this Request as irrelevant to this litigation and
6 not proportional to the needs of the case. Additionally, this Request is unduly
7 burdensome because numerous documents may tangentially refer to this Request.

8

9 **REQUEST FOR PRODUCTION NO. 173:**

10 Any and all documents regarding any treatment, evaluation, consultation or
11 therapy rendered by Andrea Solis to Daniel Cohen in 2013.

12 **RESPONSE TO REQUEST NO. 173:**

13 Objection. Plaintiff's medical records were previously requested for Request
14 No. 129 served on January 2, 2020. Defendants responded to said request on May
15 4, 2020. Defendants object to providing multiple responses to Plaintiff's medical
16 records as an improper attempt to obtain further responses. This Request is also
17 vague, ambiguous, overbroad, and seeks production of documents which are
18 protected from disclosure pursuant to the official information privilege.

19 Responding Party further objects to this Request as irrelevant to this litigation and
20 not proportional to the needs of the case. Additionally, this Request is unduly
21 burdensome because numerous documents may tangentially refer to this Request.

22

23 **REQUEST FOR PRODUCTION NO. 174:**

24 Any and all documents regarding any treatment, evaluation, consultation or
25 therapy rendered by Andrea Solis to Daniel Cohen in 2014.

26 **RESPONSE TO REQUEST NO. 174:**

1 Objection. Plaintiff's medical records were previously requested for Request
2 No. 129 served on January 2, 2020. Defendants responded to said request on May
3 4, 2020. Defendants object to providing multiple responses to Plaintiff's medical
4 records as an improper attempt to obtain further responses. This Request is also
5 vague, ambiguous, overbroad, and seeks production of documents which are
6 protected from disclosure pursuant to the official information privilege.
7 Responding Party further objects to this Request as irrelevant to this litigation and
8 not proportional to the needs of the case. Additionally, this Request is unduly
9 burdensome because numerous documents may tangentially refer to this Request.
10

11 REQUEST FOR PRODUCTION NO. 175:

12 Any and all documents regarding Daniel Cohen complaining in 2013 to any
13 current or former COLA employee that he had been assaulted or battered.
14

15 RESPONSE TO REQUEST NO. 175:

16 Objection. This Request is vague, ambiguous, overbroad, and seeks
17 production of documents which are protected from disclosure pursuant to the
18 official information privilege. Responding Party further objects to this Request as
19 irrelevant to this litigation and not proportional to the needs of the case.
20 Additionally, this Request is unduly burdensome because numerous documents
21 may tangentially refer to this Request.
22

23 Notwithstanding the aforementioned objections, Responding Party has
24 conducted a diligent search and made a reasonable inquiry and has determined that
25 there are no responsive documents in its possession, custody or control. Discovery
26 and investigation are ongoing.
27
28

1 REQUEST FOR PRODUCTION NO. 176:

2 Any and all documents regarding Daniel Cohen complaining in 2014 to any
3 current or former COLA employee that he had been assaulted or battered.

4 RESPONSE TO REQUEST NO. 176:

5 Objection. This request is vague, ambiguous, overbroad, and seeks
6 production of documents which are protected from disclosure pursuant to the
7 official information privilege. Responding Party further objects to this Request as
8 irrelevant to this litigation and not proportional to the needs of the case.

9 Additionally, this Request is unduly burdensome because numerous documents
10 may tangentially refer to this Request.

12 Notwithstanding the aforementioned objections, Responding Party has
13 conducted a diligent search and made a reasonable inquiry and has determined that
14 there are no responsive documents in its possession, custody or control. Discovery
15 and investigation are ongoing.

17 REQUEST FOR PRODUCTION NO. 177:

18 Any and all documents regarding Daniel Cohen complaining in June 2013 that he
19 was punched in the face while he was at N011h County Correctional Facility.

21 RESPONSE TO REQUEST NO. 177:

22 Objection. This request is vague, ambiguous, and overbroad as to scope and
23 substance. Responding Party further objects to this Request as irrelevant to this
24 litigation and not proportional to the needs of the case. Additionally, this Request
25 is unduly burdensome because numerous documents may tangentially refer to this
26 Request. This Request seeks documents that contain confidential and proprietary
27 business information.

1 Notwithstanding the aforementioned objections, Responding Party has
2 conducted a diligent search and made a reasonable inquiry and has determined that
3 there are no responsive documents in its possession, custody or control.

4

5 **REQUEST FOR PRODUCTION NO. 178:**

6 Any and all documents regarding any medical treatment that Daniel Cohen
7 received from Nurse De La Cruz-Galvez as a result of Daniel Cohen's complaint in
8 June 2013 that he was punched in the face while he was at North County
9 Correctional Facility.

10 **RESPONSE TO REQUEST NO. 178:**

11 Objection. Plaintiff's medical records were previously requested for Request
12 No. 129 served on January 2, 2020. Defendants responded to said request on May
13 4, 2020. Defendants object to providing multiple responses to Plaintiff's medical
14 records as an improper attempt to obtain further responses. This Request is also
15 vague, ambiguous, overbroad, and seeks production of documents which are
16 protected from disclosure pursuant to the official information privilege.

17 Responding Party further objects to this Request as irrelevant to this litigation and
18 not proportional to the needs of the case. Additionally, this Request is unduly
19 burdensome because numerous documents may tangentially refer to this Request.

20

21 Notwithstanding the aforementioned objections, discovery and investigation
22 are ongoing.

23

24 **REQUEST FOR PRODUCTION NO. 179:**

25 Any and all documents regarding any medical treatment that Daniel Cohen
26 received from any current or former COLA/LAC SD medical staff employee as a
27

1 result of Daniel Cohen's complaint in June 2013 that he was punched in the face
2 while he was at North County Correctional Facility.

3 **RESPONSE TO REQUEST NO. 179:**

4 Objection. Plaintiff's medical records were previously requested for Request
5 No. 129 served on January 2, 2020. Defendants responded to said request on May
6 4, 2020. Defendants object to providing multiple responses to Plaintiff's medical
7 records as an improper attempt to obtain further responses. This Request is also
8 vague, ambiguous, overbroad, and seeks production of documents which are
9 protected from disclosure pursuant to the official information privilege.
10 Responding Party further objects to this Request as irrelevant to this litigation and
11 not proportional to the needs of the case. Additionally, this Request is unduly
12 burdensome because numerous documents may tangentially refer to this Request.
13

14 **REQUEST FOR PRODUCTION NO. 180:**

15 Any and all documents regarding the decision to transfer Daniel Cohen from North
16 County Correctional Facility to Twin Towers Correctional Facility in June 2013.
17

18 **RESPONSE TO REQUEST NO. 180:**

19 Objection. This Request is vague, ambiguous, overbroad as to scope and
20 substance. It also seeks production of documents which are protected from
21 disclosure pursuant to the official information privilege. Responding Party further
22 objects to this Request as irrelevant to this litigation and not proportional to the
23 needs of the case. Additionally, this Request is unduly burdensome because
24 numerous documents may tangentially refer to this Request. This Request seeks
25 documents that contain confidential and proprietary business information.
26 Discovery and investigation are ongoing.
27
28

1 REQUEST FOR PRODUCTION NO. 181:

2 Any and all documents regarding the decision to transfer Daniel Cohen from Twin
3 Towers Correctional Facility to Men's Central Jail in June 2013.

4 RESPONSE TO REQUEST NO. 181:

5 Objection. Plaintiff's medical records were previously requested for Request
6 No. 129 served on January 2, 2020. Defendants responded to said request on May
7 4, 2020. Defendants object to providing multiple responses to Plaintiff's medical
8 records as an improper attempt to obtain further responses. This Request is also
9 vague, ambiguous, overbroad, and seeks production of documents which are
10 protected from disclosure pursuant to the official information privilege.

11 Responding Party further objects to this Request as irrelevant to this litigation and
12 not proportional to the needs of the case. This Request seeks documents that
13 contain confidential and proprietary business information. Additionally, this
14 Request is unduly burdensome because numerous documents may tangentially
15 refer to this Request. Discovery and investigation are ongoing.

17 REQUEST FOR PRODUCTION NO. 182:

19 Any and all documents regarding the decision to transfer Daniel Cohen from Men's
20 Central Jail back to from North County Correctional Facility in June 2013.

21 RESPONSE TO REQUEST NO. 182:

22 Objection. This Request is vague, ambiguous, overbroad as to scope and
23 substance. It also seeks production of documents which are protected from
24 disclosure pursuant to the official information privilege. Responding Party further
25 objects to this Request as irrelevant to this litigation and not proportional to the
26 needs of the case. Additionally, this Request is unduly burdensome because
27 numerous documents may tangentially refer to this Request. This Request seeks
28

1 documents that contain confidential and proprietary business information.
2

3 Discovery and investigation are ongoing.
4

5 REQUEST FOR PRODUCTION NO. 183:
6

7 Any and all requests that Daniel Cohen made for medical treatment, aid or
8 assistance during the time period from January 28, 2013 to May 9, 2014.
9

10 RESPONSE TO REQUEST NO. 183:
11

12 Objection. Plaintiff's medical records were previously requested for Request
13 No. 129 served on January 2, 2020. Defendants responded to said request on May
14 4, 2020. Defendants object to providing multiple responses to Plaintiff's medical
15 records as an improper attempt to obtain further responses. This Request is also
16 vague, ambiguous, overbroad, and seeks production of documents which are
17 protected from disclosure pursuant to the official information privilege.
18

19 Responding Party further objects to this Request as irrelevant to this litigation and
20 not proportional to the needs of the case. Additionally, this Request is unduly
21 burdensome because numerous documents may tangentially refer to this Request.
22

23 Notwithstanding the aforementioned objections, Responding Party has
24 conducted a diligent search and made a reasonable inquiry and has determined that
25 there are no responsive documents in its possession, custody or control. Discovery
26 and investigation are continuing.
27

28 REQUEST FOR PRODUCTION NO. 184:
29

30 Any and all documents prepared by any current or former COLA/LACSD medical
31 staff employee regarding any surgery performed on Daniel Cohen in June 27 2013.
32

33 RESPONSE TO REQUEST NO. 184:
34

35 Objection. Plaintiff's medical records were previously requested for Request
36 No. 129 served on January 2, 2020. Defendants responded to said request on May
37

1 4, 2020. Defendants object to providing multiple responses to Plaintiff's medical
2 records as an improper attempt to obtain further responses. This Request is also
3 vague, ambiguous, overbroad, and seeks production of documents which are
4 protected from disclosure pursuant to the official information privilege.

5 Responding Party further objects to this Request as irrelevant to this litigation and
6 not proportional to the needs of the case. Additionally, this Request is unduly
7 burdensome because numerous documents may tangentially refer to this Request.

8

9 **REQUEST FOR PRODUCTION NO. 185:**

10 Any and all documents prepared by any current or former COLA/LACSD medical
11 staff employee regarding any surgery performed on Daniel Cohen in October 2013.

12 **RESPONSE TO REQUEST NO. 185:**

13 Objection. This Request is a duplicate of request No. 129 that Defendant
14 responded to previously. This Request is vague, ambiguous, overbroad, and seeks
15 production of documents which are protected from disclosure pursuant to the
16 official information privilege. Responding Party further objects to this Request as
17 irrelevant to this litigation and not proportional to the needs of the case.

18 Additionally, this Request is unduly burdensome because numerous documents
19 may tangentially refer to this Request. This Request seeks documents that contain
20 confidential and proprietary business information. Discovery and investigation are
21 ongoing.

22

23

24

25 **REQUEST FOR PRODUCTION NO. 186:**

26 Any and all documents prepared by any cm Tent or former COLA/LACSD
27 medical staff employee regarding any surgery perfonned on Daniel Cohen in
28 January 2014.

1 **RESPONSE TO REQUEST NO. 186:**

2 Objection. Plaintiff's medical records were previously requested for Request
3 No. 129 served on January 2, 2020. Defendants responded to said request on May
4, 2020. Defendants object to providing multiple responses to Plaintiff's medical
5 records as an improper attempt to obtain further responses. This Request is also
6 vague, ambiguous, overbroad, and seeks production of documents which are
7 protected from disclosure pursuant to the official information privilege.
8 Responding Party further objects to this Request as irrelevant to this litigation and
9 not proportional to the needs of the case. Additionally, this Request is unduly
10 burdensome because numerous documents may tangentially refer to this Request.
11 Discovery and investigation are ongoing.
12

13 **REQUEST FOR PRODUCTION NO. 187:**

14 Any and all documents prepared by any current or former COLA/LACSD medical
15 staff employee regarding Daniel Cohen's diagnosis of "having a macular retinal
16 detachment in both eyes" in or around June 2013.
17

18 **RESPONSE TO REQUEST NO. 187:**

19 Objection. Plaintiff's medical records were previously requested for Request
20 No. 129 served on January 2, 2020. Defendants responded to said request on May
21 4, 2020. Defendants object to providing multiple responses to Plaintiff's medical
22 records as an improper attempt to obtain further responses. This Request is also
23 vague, ambiguous, overbroad, and seeks production of documents which are
24 protected from disclosure pursuant to the official information privilege.
25 Responding Party further objects to this Request as irrelevant to this litigation and
26 not proportional to the needs of the case. Additionally, this Request is unduly
27 burdensome because numerous documents may tangentially refer to this Request.
28 Discovery and investigation are ongoing.

1 REQUEST FOR PRODUCTION NO. 188:

2 Any and all documents which support the COLA's contention that "[t]hroughout
3 plaintiff's stay in the CTC, his only statement to medical staff was pain pill
4 please."

5 RESPONSE TO REQUEST NO. 188:

6 Objection. Plaintiff's medical records were previously requested for Request
7 No. 129 served on January 2, 2020. Defendants responded to said request on May
8 4, 2020. Defendants object to providing multiple responses to Plaintiff's medical
9 records as an improper attempt to obtain further responses. This Request is also
10 vague, ambiguous, overbroad, and seeks production of documents which are
11 protected from disclosure pursuant to the official information privilege.

12 Responding Party further objects to this Request as irrelevant to this litigation and
13 not proportional to the needs of the case. Additionally, this Request is unduly
14 burdensome because numerous documents may tangentially refer to this Request.
15 Notwithstanding the aforementioned objections, discovery and investigation are
16 ongoing.

18 REQUEST FOR PRODUCTION NO. 189:

19 Any and all documents which support the COLA's contention that between August
20 and September 2013, Daniel Cohen's medical records "indicated that he
21 Complained of ear aches and headaches."

23 RESPONSE TO REQUEST NO. 189:

24 Objection. Plaintiff's medical records were previously requested for Request
25 No. 129 served on January 2, 2020. Defendants responded to said request on May
26 4, 2020. Defendants object to providing multiple responses to Plaintiff's medical
27 records as an improper attempt to obtain further responses. This Request is also
28

1 vague, ambiguous, overbroad, and seeks production of documents which are
2 protected from disclosure pursuant to the official information privilege.
3 Responding Party further objects to this Request as irrelevant to this litigation and
4 not proportional to the needs of the case. Additionally, this Request is unduly
5 burdensome because numerous documents may tangentially refer to this Request.
6 Notwithstanding the aforementioned objections, discovery and investigation are
7 ongoing.

8

9 **REQUEST FOR PRODUCTION NO. 190:**

10 Any and all documents prepared by Dr. Orlando Pile regarding his medical
11 valuation of Daniel Cohen.

12 **RESPONSE TO REQUEST NO. 190:**

13 Objection. Plaintiff's medical records were previously requested for Request
14 No. 129 served on January 2, 2020. Defendants responded to said request on May
15 4, 2020. Defendants object to providing multiple responses to Plaintiff's medical
16 records as an improper attempt to obtain further responses. This Request is also
17 vague, ambiguous, overbroad, and seeks production of documents which are
18 protected from disclosure pursuant to the official information privilege.

19 Responding Party further objects to this Request as irrelevant to this litigation and
20 not proportional to the needs of the case. Additionally, this Request is unduly
21 burdensome because numerous documents may tangentially refer to this Request.
22 Discovery and investigation are ongoing.

23

24 **REQUEST FOR PRODUCTION NO. 191:**

25 Any and all documents prepared by any current or former COLA/LACSD medical
26 staff employee regarding Daniel Cohen's medical evaluation by Dr. Orlando Pile.

1 **RESPONSE TO REQUEST NO. 191:**

2 Objection. Plaintiff's medical records were previously requested for Request
3 No. 129 served on January 2, 2020. Defendants responded to said request on May
4, 2020. Defendants object to providing multiple responses to Plaintiff's medical
5 records as an improper attempt to obtain further responses. This Request is also
6 vague, ambiguous, overbroad, and seeks production of documents which are
7 protected from disclosure pursuant to the official information privilege.

8 Responding Party further objects to this Request as irrelevant to this litigation and
9 not proportional to the needs of the case. Additionally, this Request is unduly
10 burdensome because numerous documents may tangentially refer to this Request.
11 Discovery and investigation are ongoing.

12

13 **REQUEST FOR PRODUCTION NO. 192:**

14 Any and all documents regarding Daniel Cohen's medical evaluation by Dr.
15 Orlando Pile, including the results of Daniel Cohen's Hands Ears Eyes Nose and
16 Throat (HEENT) test and his Pupils, Equal Round, React to Light,
17 Accommodation 5 (PERLA) exam.

18 **RESPONSE TO REQUEST NO. 192:**

19 Objection. Plaintiff's medical records were previously requested for Request
20 No. 129 served on January 2, 2020. Defendants responded to said request on May
21 4, 2020. Defendants object to providing multiple responses to Plaintiff's medical
22 records as an improper attempt to obtain further responses. This Request is also
23 vague, ambiguous, overbroad, and seeks production of documents which are
24 protected from disclosure pursuant to the official information privilege.

25 Responding Party further objects to this Request as irrelevant to this litigation and
26 not proportional to the needs of the case. Additionally, this Request is unduly
27

1 burdensome because numerous documents may tangentially refer to this Request.
2 Discovery is ongoing.
3

4 REQUEST FOR PRODUCTION NO. 193:

5 Any and all documents regarding Daniel Cohen's medical diagnosis by Dr.
6 Orlando Pile.

7 RESPONSE TO REQUEST NO. 193:

8 Objection. Plaintiff's medical records were previously requested for Request
9 No. 129 served on January 2, 2020. Defendants responded to said request on May
10 4, 2020. Defendants object to providing multiple responses to Plaintiff's medical
11 records as an improper attempt to obtain further responses. This Request is also
12 vague, ambiguous, overbroad, and seeks production of documents which are
13 protected from disclosure pursuant to the official information privilege.

14 Responding Party further objects to this Request as irrelevant to this litigation and
15 not proportional to the needs of the case. Additionally, this Request is unduly
16 burdensome because numerous documents may tangentially refer to this Request.
17 Discovery and investigation are ongoing.

19
20 REQUEST FOR PRODUCTION NO. 194:

21 Any and all documents regarding Daniel Cohen telling a nurse on December 31,
22 2013 that he (Daniel Cohen) went unconscious when trying to get down from a top
23 bunk.

24 RESPONSE TO REQUEST NO. 194:

25 Objection. This Request is vague, ambiguous, overbroad, and seeks
26 production of documents which are protected from disclosure pursuant to the
27 official information privilege. Responding Party further objects to this Request as
28 irrelevant to this litigation and not proportional to the needs of the case.

1 Additionally, this Request is unduly burdensome because numerous documents
2 may tangentially refer to this Request.

3

4 **REQUEST FOR PRODUCTION NO. 195:**

5 Any and all documents prepared by Dr. Frederick Williams regarding his medical
6 evaluation of Daniel Cohen.

7 **RESPONSE TO REQUEST NO. 195:**

8 Objection. Plaintiff's medical records were previously requested for Request
9 No. 129 served on January 2, 2020. Defendants responded to said request on May
10 4, 2020. Defendants object to providing multiple responses to Plaintiff's medical
11 records as an improper attempt to obtain further responses. This Request is also
12 vague, ambiguous, overbroad, and seeks production of documents which are
13 protected from disclosure pursuant to the official information privilege.

14 Responding Party further objects to this Request as irrelevant to this litigation and
15 not proportional to the needs of the case. Additionally, this Request is unduly
16 burdensome because numerous documents may tangentially refer to this Request.
17 Discovery and investigation are ongoing.

18

19 **REQUEST FOR PRODUCTION NO. 196:**

20 Any and all documents prepared by any current or former COLA/LACSD medical
21 staff employee regarding Daniel Cohen's medical evaluation by Dr. Frederick
22 Williams.

23

24 **RESPONSE TO REQUEST NO. 196:**

25 Objection. Plaintiff's medical records were previously requested for Request
26 No. 129 served on January 2, 2020. Defendants responded to said request on May
27 4, 2020. Defendants object to providing multiple responses to Plaintiff's medical
28 records as an improper attempt to obtain further responses. This Request is also

1 vague, ambiguous, overbroad, and seeks production of documents which are
2 protected from disclosure pursuant to the official information privilege.

3 Responding Party further objects to this Request as irrelevant to this litigation and
4 not proportional to the needs of the case. Additionally, this Request is unduly
5 burdensome because numerous documents may tangentially refer to this Request.

6

7 **REQUEST FOR PRODUCTION NO. 197:**

8 Any and all documents regarding Daniel Cohen's medical evaluation by Dr.
9 Frederick Williams, including Dr. Williams noting a facial orbital trauma due to an
10 altercation.

11 **RESPONSE TO REQUEST NO. 197:**

12 Objection. Plaintiff's medical records were previously requested for Request
13 No. 129 served on January 2, 2020. Defendants responded to said request on May
14 4, 2020. Defendants object to providing multiple responses to Plaintiff's medical
15 records as an improper attempt to obtain further responses. This Request is also
16 vague, ambiguous, overbroad, and seeks production of documents which are
17 protected from disclosure pursuant to the official information privilege.

18 Responding Party further objects to this Request as irrelevant to this litigation and
19 not proportional to the needs of the case. Additionally, this Request is unduly
20 burdensome because numerous documents may tangentially refer to this Request.

21

22 **REQUEST FOR PRODUCTION NO. 198:**

23 Any and all documents regarding Daniel Cohen's medical diagnosis by Dr.
24 Frederick Williams.

25 **RESPONSE TO REQUEST NO. 198:**

26 Objection. Plaintiff's medical records were previously requested for Request
27 No. 129 served on January 2, 2020. Defendants responded to said request on May
28

1 4, 2020. Defendants object to providing multiple responses to Plaintiff's medical
2 records as an improper attempt to obtain further responses. This Request is also
3 vague, ambiguous, overbroad, and seeks production of documents which are
4 protected from disclosure pursuant to the official information privilege.

5 Responding Party further objects to this Request as irrelevant to this litigation and
6 not proportional to the needs of the case. Additionally, this Request is unduly
7 burdensome because numerous documents may tangentially refer to this Request.
8 Discovery and investigation are ongoing.

9

10 REQUEST FOR PRODUCTION NO. 199:

11 Any and all documents regarding the decision to provide Daniel Cohen with a
12 wheelchair on or about January 15, 2014.

13 RESPONSE TO REQUEST NO. 199:

14 Objection. Plaintiff's medical records were previously requested for Request
15 No. 129 served on January 2, 2020. Defendants responded to said request on May
16 4, 2020. Defendants object to providing multiple responses to Plaintiff's medical
17 records as an improper attempt to obtain further responses. This Request is also
18 vague, ambiguous, overbroad, and seeks production of documents which are
19 protected from disclosure pursuant to the official information privilege.

20 Responding Party further objects to this Request as irrelevant to this litigation and
21 not proportional to the needs of the case. Additionally, this Request is unduly
22 burdensome because numerous documents may tangentially refer to this Request.

23 Notwithstanding the aforementioned objections, Responding Party has
24 conducted a diligent search and made a reasonable inquiry and has determined that
25 there are no responsive documents in its possession, custody or control. Discovery
26 and investigation are continuing.

1 REQUEST FOR PRODUCTION NO. 200:

2 Any and all documents assigning Daniel Cohen to be housed to any part of Los
3 Angeles County Jail between January 28, 2013 and May 9, 2014.

4 RESPONSE TO REQUEST NO. 200:

5 Objection. This Request is vague, ambiguous, overbroad, and seeks
6 production of documents which are protected from disclosure pursuant to the
7 official information privilege. Responding Party further objects to this Request as
8 irrelevant to this litigation and not proportional to the needs of the case.

9 Additionally, this Request is unduly burdensome because numerous documents
10 may tangentially refer to this Request.

11 Notwithstanding the aforementioned objections, Responding Party has
12 conducted a diligent search and made a reasonable inquiry and has determined that
13 there are no responsive documents in its possession, custody or control. Discovery
14 and investigation are continuing.

15 REQUEST FOR PRODUCTION NO. 201:

16 Any and all medical intake documents prepared by any current or former COLA
17 employee per COLA policy, after Daniel Cohen's arrest on or about January 28,
18 2013.

19 RESPONSE TO REQUEST NO. 201:

20 Objection. Plaintiff's medical records were previously requested for Request
21 No. 129 served on January 2, 2020. Defendants responded to said request on May
22 4, 2020. Defendants object to providing multiple responses to Plaintiff's medical
23 records as an improper attempt to obtain further responses. This Request is also
24 vague, ambiguous, overbroad, and seeks production of documents which are
25 protected from disclosure pursuant to the official information privilege.

26 Responding Party further objects to this Request as irrelevant to this litigation and

1 not proportional to the needs of the case. This Request seeks documents that
2 contain confidential and proprietary business information. Additionally, this
3 Request is unduly burdensome because numerous documents may tangentially
4 refer to this Request.

5

6 **REQUEST FOR PRODUCTION NO. 202:**

7 Any and all documents prepared by Daniel Cohen while in the custody of the
8 COLA, in which he requested glasses, corrective lenses, or any visual aids from
9 the COLA in the year 2013.

10 **RESPONSE TO REQUEST NO. 202:**

11 Objection. Plaintiff's medical records were previously requested for Request
12 No. 129 served on January 2, 2020. Defendants responded to said request on May
13 4, 2020. Defendants object to providing multiple responses to Plaintiff's medical
14 records as an improper attempt to obtain further responses. This Request is also
15 vague, ambiguous, overbroad, and seeks production of documents which are
16 protected from disclosure pursuant to the official information privilege.

17 Responding Party further objects to this Request as irrelevant to this litigation and
18 not proportional to the needs of the case. Additionally, this Request is unduly
19 burdensome because numerous documents may tangentially refer to this Request.

20
21 Notwithstanding the aforementioned objections, Responding Party has
22 conducted a diligent search and made a reasonable inquiry and has determined that
23 there are no responsive documents in its possession, custody or control. Discovery
24 and investigation are continuing.

25
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28 ///

1 REQUEST FOR PRODUCTION NO. 203:

2 Any and all documents prepared by Daniel Cohen while in the custody of the
3 COLA, in which he requested glasses, corrective lenses, or any visual aids from
4 the COLA in the year 2014.

5 RESPONSE TO REQUEST NO. 203:

6 Objection. Plaintiff's medical records were previously requested for Request
7 No. 129 served on January 2, 2020. Defendants responded to said request on May
8 4, 2020. Defendants object to providing multiple responses to Plaintiff's medical
9 records as an improper attempt to obtain further responses. This Request is also
10 vague, ambiguous, overbroad as to scope and substance. Responding Party further
11 objects to this Request as irrelevant to this litigation and not proportional to the
12 needs of the case. Additionally, this Request is unduly burdensome because
13 numerous documents may tangentially refer to this Request.

14
15 Notwithstanding the aforementioned objections, Responding Party has
16 conducted a diligent search and made a reasonable inquiry and has determined that
17 there are no responsive documents in its possession, custody or control. Discovery
18 and investigation are continuing.

19
20 REQUEST FOR PRODUCTION NO. 204:

21 Any and all documents prepared by Daniel Cohen while in the custody of the
22 COLA, in which he requested an appointment for an eye examination in the year
23 2013.

24 RESPONSE TO REQUEST NO. 204:

25 Objection. Plaintiff's medical records were previously requested for Request
26 No. 129 served on January 2, 2020. Defendants responded to said request on May
27 4, 2020. Defendants object to providing multiple responses to Plaintiff's medical
28 records as an improper attempt to obtain further responses. This Request is also

1 vague, ambiguous, overbroad as to scope and substance. Responding Party further
2 objects to this Request as irrelevant to this litigation and not proportional to the
3 needs of the case. Additionally, this Request is unduly burdensome because
4 numerous documents may tangentially refer to this Request.

5

6 **REQUEST FOR PRODUCTION NO. 205:**

7 Any and all documents prepared by Daniel Cohen while in the custody of the
8 COLA, in which he requested an appointment for an eye examination in the year
9 2014.

10 **RESPONSE TO REQUEST NO. 205:**

11 Objection. Plaintiff's medical records were previously requested for Request
12 No. 129 served on January 2, 2020. Defendants responded to said request on May
13 4, 2020. Defendants object to providing multiple responses to Plaintiff's medical
14 records as an improper attempt to obtain further responses. This Request is also
15 vague, ambiguous, overbroad, and seeks production of documents which are
16 protected from disclosure pursuant to the official information privilege.

17 Responding Party further objects to this Request as irrelevant to this litigation and
18 not proportional to the needs of the case. Additionally, this Request is unduly
19 burdensome because numerous documents may tangentially refer to this Request.

20

21

22 **REQUEST FOR PRODUCTION NO. 206:**

23 Any and all documents prepared by any current or former COLA employee in
24 response to Daniel Cohen's request for an appointment for an eye examination in
25 the year 2013.

26

27 ////

28

1 **RESPONSE TO REQUEST NO. 206:**

2 Objection. This Request is a duplicate of request No. 129 that Defendant
3 responded to previously. This Request is vague, ambiguous, overbroad as to scope
4 and substance. Responding Party further objects to this Request as irrelevant to this
5 litigation and not proportional to the needs of the case. Additionally, this Request
6 is unduly burdensome because numerous documents may tangentially refer to this
7 Request. This Request seeks documents that contain confidential and proprietary
8 business information.

9

10 **REQUEST FOR PRODUCTION NO. 207:**

11 Any and all documents prepared by any current or former COLA employee in
12 response to Daniel Cohen's request for an appointment for an eye examination in
13 the year 2014.

14 **RESPONSE TO REQUEST NO. 207:**

15 Objection. Plaintiff's medical records were previously requested for Request
16 No. 129 served on January 2, 2020. Defendants responded to said request on May
17 4, 2020. Defendants object to providing multiple responses to Plaintiff's medical
18 records as an improper attempt to obtain further responses. This Request is also
19 vague, ambiguous, overbroad, and seeks production of documents which are
20 protected from disclosure pursuant to the official information privilege.

21 Responding Party further objects to this Request as irrelevant to this litigation and
22 not proportional to the needs of the case. Additionally, this Request is unduly
23 burdensome because numerous documents may tangentially refer to this Request.

24

25

26

27 ////

28

1 REQUEST FOR PRODUCTION NO. 208:

2 Any and all documents prepared by any current or former COLA employee in
3 response to Daniel Cohen's request for glasses, corrective lenses, or any visual aids
4 in the year 2013.

5 RESPONSE TO REQUEST NO. 208:

6 Objection. Plaintiff's medical records were previously requested for Request
7 No. 129 served on January 2, 2020. Defendants responded to said request on May
8 4, 2020. Defendants object to providing multiple responses to Plaintiff's medical
9 records as an improper attempt to obtain further responses. This Request is also
10 vague, ambiguous, overbroad, and seeks production of documents which are
11 protected from disclosure pursuant to the official information privilege.

12 Responding Party further objects to this Request as irrelevant to this litigation and
13 not proportional to the needs of the case. Additionally, this Request is unduly
14 burdensome because numerous documents may tangentially refer to this Request.
15

16 REQUEST FOR PRODUCTION NO. 209:

17 Any and all documents prepared by any current or former COLA employee in
18 response to Daniel Cohen's request for glasses, corrective lenses, or any visual aids
19 in the year 2014.

21 RESPONSE TO REQUEST NO. 209:

22 Objection. Plaintiff's medical records were previously requested for Request
23 No. 129 served on January 2, 2020. Defendants responded to said request on May
24 4, 2020. Defendants object to providing multiple responses to Plaintiff's medical
25 records as an improper attempt to obtain further responses. This Request is also
26 vague, ambiguous, overbroad, and seeks production of documents which are
27 protected from disclosure pursuant to the official information privilege.

28 Responding Party further objects to this Request as irrelevant to this litigation and

1 not proportional to the needs of the case. Additionally, this Request is unduly
2 burdensome because numerous documents may tangentially refer to this Request.
3

4 REQUEST FOR PRODUCTION NO. 210:

5 Any and all documents which were prepared for the purpose of assigning Daniel
6 Cohen to be housed in particular area of the Los Angeles County Jail, after his
7 arrest on or about January 28, 2013.

8 RESPONSE TO REQUEST NO. 210:

9 Objection. This Request is vague, ambiguous, overbroad, and seeks
10 production of documents which are protected from disclosure pursuant to the
11 official information privilege. Responding Party further objects to this Request as
12 irrelevant to this litigation and not proportional to the needs of the case.

13 Additionally, this Request is unduly burdensome because numerous documents
14 may tangentially refer to this Request. This Request seeks documents that contain
15 confidential and proprietary business information.

17 REQUEST FOR PRODUCTION NO. 211:

19 Any and all documents which were prepared for the purpose of assigning Daniel
20 Cohen to a dorm from January 28, 2013 to May 9, 2014.

21 RESPONSE TO REQUEST NO. 211:

22 Objection. This Request is vague, ambiguous, overbroad as to scope and
23 substance. It also seeks production of documents which are protected from
24 disclosure pursuant to the official information privilege. Responding Party further
25 objects to this Request as irrelevant to this litigation and not proportional to the
26 needs of the case. Additionally, this Request is unduly burdensome because
27 numerous documents may tangentially refer to this Request. This Request seeks
28 documents that contain confidential and proprietary business information.

1
2 REQUEST FOR PRODUCTION NO. 212:

3 Any and all rosters or logs which list the Los Angeles County Sheriffs Department
4 deputies who were assigned to work in Daniel Cohen's assigned dorm on February
5 12, 2013.

6 RESPONSE TO REQUEST NO. 212:

7 Objection. This Request is vague, ambiguous, overbroad as to substance. It
8 also seeks production of documents which are protected from disclosure pursuant
9 to the official information privilege. Responding Party further objects to this
10 Request as irrelevant to this litigation and not proportional to the needs of the case.
11 Additionally, this Request is unduly burdensome because numerous documents
12 may tangentially refer to this Request. This Request seeks documents that contain
13 confidential and proprietary business information. This Request even seeks to
14 invade the right of privacy held by Defendants' employees in regards to their
15 employment/personnel records.

17
18 REQUEST FOR PRODUCTION NO. 213:

19 Any and all rosters or logs which list the Los Angeles County Sheriffs Department
20 deputies who were assigned to work in Daniel Cohen's assigned dorm
21 on February 14, 2013.

22 RESPONSE TO REQUEST NO. 213:

23 Objection. This Request is vague, ambiguous, overbroad, and seeks
24 production of documents which are protected from disclosure pursuant to the
25 official information privilege. Responding Party further objects to this Request as
26 irrelevant to this litigation and not proportional to the needs of the case.
27 Additionally, this Request is unduly burdensome because numerous documents
28 may tangentially refer to this Request. This Request seeks documents that contain

1 confidential and proprietary business information. This Request even seeks to
2 invade the right of privacy held by Defendants' employees in regards to their
3 employment/personnel records.

4

5 **REQUEST FOR PRODUCTION NO. 214:**

6 Any and all documents prepared by any current or former COLA employee
7 regarding Daniel Cohen being selected for a work release program in the year
8 2013.

9 **RESPONSE TO REQUEST NO. 214:**

10 Objection. This Request is vague, ambiguous, overbroad, and seeks
11 production of documents which are protected from disclosure pursuant to the
12 official information privilege. Responding Party further objects to this Request as
13 irrelevant to this litigation and not proportional to the needs of the case.
14 Additionally, this Request is unduly burdensome because numerous documents
15 may tangentially refer to this Request. This Request seeks documents that contain
16 confidential and proprietary business information.

18

19 **REQUEST FOR PRODUCTION NO. 215:**

20 Any and all documents (e.g., policies, procedures, guidelines, etc.) regarding the
21 COLA's requirement(s) for a pretrial detainee to be assigned to a vision
22 Impairment dorm in the year 2013.

23

24 **RESPONSE TO REQUEST NO. 215:**

25 Objection. This Request is vague, ambiguous, overbroad, and seeks
26 production of documents which are protected from disclosure pursuant to the
27 official information privilege. Responding Party further objects to this Request as
28 irrelevant to this litigation and not proportional to the needs of the case.

1 Additionally, this Request is unduly burdensome because numerous documents
2 may tangentially refer to this Request. This Request seeks documents that contain
3 confidential and proprietary business information.

4

5 **REQUEST FOR PRODUCTION NO. 216:**

6 Any and all documents (e.g., policies, procedures, guidelines, etc.) regarding the
7 COLA' s requirement(s) for a pretrial detainee to be assigned to a vision
8 impairment dorm in the year 2014.

9 **RESPONSE TO REQUEST NO. 216:**

10 Objection. It is vague, ambiguous, and overbroad. Responding Party further
11 objects to this Request as irrelevant to this litigation and not proportional to the
12 needs of the case. Additionally, this Request is unduly burdensome because
13 numerous documents may tangentially refer to this Request. This Request seeks
14 documents that contain confidential and proprietary business information.

16

17 **REQUEST FOR PRODUCTION NO. 217:**

18 Any and all documents regarding any medical evaluation of Daniel Cohen,
19 occurring on or about June 8, 2013.

20 **RESPONSE TO REQUEST NO. 217:**

21 Objection. Plaintiff's medical records were previously requested for Request
22 No. 129 served on January 2, 2020. Defendants responded to said request on May
23 4, 2020. Defendants object to providing multiple responses to Plaintiff's medical
24 records as an improper attempt to obtain further responses. This Request is also
25 vague, ambiguous, overbroad, and seeks production of documents which are
26 protected from disclosure pursuant to the official information privilege.

27 Responding Party further objects to this Request as irrelevant to this litigation and

1 not proportional to the needs of the case. Additionally, this Request is unduly
2 burdensome because numerous documents may tangentially refer to this Request.
3

4 REQUEST FOR PRODUCTION NO. 218:

5 Any and all documents regarding any medical evaluation of Daniel Cohen,
6 occurring on or about June 13, 2013.

7 RESPONSE TO REQUEST NO. 218:

8 Objection. This Request is a duplicate of request No. 129 that Defendant
9 responded to previously. It is also vague, ambiguous, overbroad, and seeks
10 production of documents which are protected from disclosure pursuant to the
11 official information privilege. Responding Party further objects to this Request as
12 irrelevant to this litigation and not proportional to the needs of the case.

13 Additionally, this Request is unduly burdensome because numerous documents
14 may tangentially refer to this Request.

16 REQUEST FOR PRODUCTION NO. 219:

18 Any and all incident reports regarding any riot which occurred on or about June 15,
19 2013, in the dorm where Daniel Cohen was assigned.

20 RESPONSE TO REQUEST NO. 219:

21 Objection. This Request is a duplicate of request No. 129 that Defendant
22 responded to previously. This Request is vague, ambiguous, overbroad, and seeks
23 production of documents which are protected from disclosure pursuant to the
24 official information privilege. Responding Party further objects to this Request as
25 irrelevant to this litigation, not proportional to the needs of the case, and calling for
26 speculation. Additionally, this Request is unduly burdensome because numerous
27 documents may tangentially refer to this Request. This Request also assumes facts.
28

1 REQUEST FOR PRODUCTION NO. 220:

2 Any and all incident reports regarding any fight between inmates which occurred
3 on or about June 15, 2013, in the d01m where Daniel Cohen was assigned.

4 RESPONSE TO REQUEST NO. 220:

5 Objection. This Request is vague, ambiguous, overbroad, and seeks
6 production of documents which are protected from disclosure pursuant to the
7 official information privilege. Responding Party further objects to this Request as
8 irrelevant to this litigation and not proportional to the needs of the case.

9 Additionally, this Request is unduly burdensome because numerous documents
10 may tangentially refer to this Request. This Request seeks to invade the right of
11 privacy held by individuals who have been or are incarcerated in Los Angeles
12 County Jails.

14 REQUEST FOR PRODUCTION NO. 221:

15 Any and all documents regarding any medical evaluation of Daniel Cohen,
16 occurring on or about June 25, 2013.

18 RESPONSE TO REQUEST NO. 221:

19 Objection. Plaintiff's medical records were previously requested for Request
20 No. 129 served on January 2, 2020. Defendants responded to said request on May
21 4, 2020. Defendants object to providing multiple responses to Plaintiff's medical
22 records as an improper attempt to obtain further responses. This Request is also
23 vague, ambiguous, overbroad, and seeks production of documents which are
24 protected from disclosure pursuant to the official information privilege.

25 Responding Party further objects to this Request as irrelevant to this litigation and
26 not proportional to the needs of the case. Additionally, this Request is unduly
27 burdensome because numerous documents may tangentially refer to this Request.

1 REQUEST FOR PRODUCTION NO. 222:

2 Any and all Los Angeles County Sheriff's Department Orders regarding Daniel
3 Cohen being transferred to LAC+USC for medical treatment in 2013.

4 RESPONSE TO REQUEST NO. 222:

5 Objection. This Request is vague, ambiguous, overbroad as to scope and
6 substance. It also seeks production of documents which are protected from
7 disclosure pursuant to the official information privilege. Responding Party further
8 objects to this Request as irrelevant to this litigation and not proportional to the
9 needs of the case. Additionally, this Request is unduly burdensome because
10 numerous documents may tangentially refer to this Request. This Request seeks
11 documents that contain confidential and proprietary business information.

12 Notwithstanding the aforementioned objections, Responding Party has
13 conducted a diligent search and made a reasonable inquiry and has determined that
14 there are no responsive documents in its possession, custody or control. Discovery
15 and investigation are continuing.

18 REQUEST FOR PRODUCTION NO. 223:

19 Any and all Los Angeles County Sheriff's Department Orders regarding Daniel
20 Cohen being transferred to LAC+USC for medical treatment in 2014.

21 RESPONSE TO REQUEST NO. 223:

22 Objection. This Request is vague, ambiguous, overbroad as to scope and
23 substance. It also seeks production of documents which are protected from
24 disclosure pursuant to the official information privilege. Responding Party further
25 objects to this Request as irrelevant to this litigation and not proportional to the
26 needs of the case. Additionally, this Request is unduly burdensome because
27 numerous documents may tangentially refer to this Request. This Request seeks
28 documents that contain confidential and proprietary business information.

1 REQUEST FOR PRODUCTION NO. 224:

2 A copy of any and all video-recordings of a fight identified as evidence in the
3 County of Los Angeles Sheriff's Department Incident Report dated June 15, 2013,
4 10 URN 913-01216-5640-144.

5 RESPONSE TO REQUEST NO. 224:

6 Objection. Responding Party objects to this Request as irrelevant to this
7 litigation and not proportional to the needs of the case. This Request seeks
8 production of documents which are protected from disclosure pursuant to the
9 official information privilege and seeks to invade the right of privacy held by
10 Defendants' employees and individuals who have been or are incarcerated in Los
11 Angeles County Jails.

12 Notwithstanding the aforementioned objections, Responding Party has
13 conducted a diligent search and made a reasonable inquiry and has determined that
14 there are no responsive documents in its possession, custody or control. Discovery
15 and investigation are continuing.

17 REQUEST FOR PRODUCTION NO. 225:

19 A copy of any video of Plaintiff being assaulted by an inmate at a Correctional
20 Facility on or about February 14, 2013.

21 RESPONSE TO REQUEST NO. 225:

22 Objection. Responding Party further objects to this Request as irrelevant to
23 this litigation and not proportional to the needs of the case. Additionally, this
24 Request calls for a legal conclusion and seeks information that would violate the
25 privacy rights of Defendants' employees and inmates who have been or are
26 incarcerated in Los Angeles County Jails.

28 Notwithstanding the aforementioned objections, Responding Party has
29 conducted a diligent search and made a reasonable inquiry and has determined that

1 there are no responsive documents in its possession, custody or control. Discovery
2 and investigation are continuing.

3

4 REQUEST FOR PRODUCTION NO. 226:

5 A copy of any and all video-recordings of the assault on Plaintiff by any inmate on
6 December 31, 2013.

7 RESPONSE TO REQUEST NO. 226:

8 Objection. Responding Party objects to this Request as irrelevant to this
9 litigation and not proportional to the needs of the case. Additionally, this Request
10 calls for a legal conclusion and seeks information that would violate the privacy
11 rights of Defendants' employees and inmates who have been or are incarcerated in
12 Los Angeles County Jails.

13 Notwithstanding the aforementioned objections, Responding Party has
14 conducted a diligent search and made a reasonable inquiry and has determined that
15 there are no responsive documents in its possession, custody or control. Discovery
16 and investigation are continuing.

17

18

19 REQUEST FOR PRODUCTION NO. 227:

20 Any and all documents reviewed by Robert Fonzi in connection with his work on
21 this case.

22 RESPONSE TO REQUEST NO. 227:

23 Objection. This Request is a duplicate of request No. 13 that Defendants
24 responded to previously. This Request seeks premature expert discovery.
25 Responding Party further objects to this Request, whether broadly or more
26 narrowly construed, in that it seeks production of documents protected by the work
27 product doctrine because they are communications between attorney and expert.

1 Responding Party further objects to this Request as irrelevant to this litigation and
2 not proportional to the needs of the case.

3

4 REQUEST FOR PRODUCTION NO. 228:

5 Any and all documents relating to any discipline imposed on Daniel Cohen by any
6 COLA/LACSD employee between January 28, 2013 and May 9, 2014.

7 RESPONSE TO REQUEST NO. 228:

8 Objection. This Request is vague, ambiguous, overbroad as to scope and
9 substance. It also seeks production of documents which are protected from
10 disclosure pursuant to the official information privilege and seeks to invade the
11 rights of privacy held by Defendants' employees. Responding Party further objects
12 to this Request as irrelevant to this litigation and not proportional to the needs of
13 the case. Additionally, this Request is unduly burdensome because numerous
14 documents may tangentially refer to this Request. This Request seeks documents
15 that contain confidential and proprietary business information.

16

17 REQUEST FOR PRODUCTION NO. 229:

18 Daniel Cohen's Jail Records for the time period between January 28, 2013 and
19 May 9, 2014.

20

21 RESPONSE TO REQUEST NO. 229:

22 Objection. This Request is vague, ambiguous, and overbroad as to scope and
23 substance. Responding Party further objects to this Request as irrelevant to this
24 litigation and not proportional to the needs of the case. Additionally, this Request
25 is unduly burdensome because numerous documents may tangentially refer to this
26 Request.

27 Notwithstanding the aforementioned objections, Responding party expressly
28 reserves the right to supplement, clarify, revise, or correct any or all responses to

1 the request, and to assert additional objections or privileges, in one or more
2 subsequent supplemental response(s). Discovery and investigation are continuing.
3

4 REQUEST FOR PRODUCTION NO. 230:

5 A copy of the Daniel Cohen's "Inmate Movement History" for the time period
6 between January 28, 2013 and May 9, 2014.

7 RESPONSE TO REQUEST NO. 230:

8 Objection. This Request has previously be asked and responded to for
9 Request No. 37. This request seeks premature expert discovery. It also seeks
10 production of documents which are protected from disclosure pursuant to the
11 official information privilege. Responding Party further objects to this Request as
12 irrelevant to this litigation and not proportional to the needs of the case.
13

14 Notwithstanding the aforementioned objections, Responding party expressly
15 reserves the right to supplement, clarify, revise, or correct any or all responses to
16 the request, and to assert additional objections or privileges, in one or more
17 subsequent supplemental response(s) in accordance with the time period for
18 exchanging expert reports set by the Court.
19

20 REQUEST FOR PRODUCTION NO. 231:

21 A copy of the "Crime Rpt-05-12-13 180301".

22 RESPONSE TO REQUEST NO. 231:

23 Objection. This Request has been asked and responded to for Request No.
24 39. This request seeks premature expert discovery. It also seeks production of
25 documents which are protected from disclosure pursuant to the official information
26 privilege. Responding Party further objects to this Request as irrelevant to this
27 litigation and not proportional to the needs of the case.
28

1 Notwithstanding the aforementioned objections, Responding party expressly
2 reserves the right to supplement, clarify, revise, or correct any or all responses to
3 the request, and to assert additional objections or privileges, in one or more
4 subsequent supplemental response(s) in accordance with the time period for
5 exchanging expert reports set by the Court. Discovery and investigation are
6 continuing.

7

8 **REQUEST FOR PRODUCTION NO. 232:**

9 A copy of the "Inmate Discipline Report Arrest 5-12-13 (Booking #3557770)
10 180305"

11 **RESPONSE TO REQUEST NO. 232:**

12 Objection. This Request has been asked and responded to for Request No.
13 40. This request seeks premature expert discovery. It also seeks production of
14 documents which are protected from disclosure pursuant to the official information
15 privilege. Responding Party further objects to this Request as irrelevant to this
16 litigation and not proportional to the needs of the case.

17

18 Notwithstanding the aforementioned objections, Responding party expressly
19 reserves the right to supplement, clarify, revise, or correct any or all responses to
20 the request, and to assert additional objections or privileges, in one or more
21 subsequent supplemental response(s) in accordance with the time period for
22 exchanging expert reports set by the Court.

23

24 **REQUEST FOR PRODUCTION NO. 233:**

25 A copy of the "Inmate Info Arrest Date 3-11-13 180305".

26

27 **RESPONSE TO REQUEST NO. 233:**

28 Objection. This Request has been asked and responded to for Request No.
41. This request seeks premature expert discovery. It also seeks production of

1 documents which are protected from disclosure pursuant to the official information
2 privilege. Responding Party further objects to this Request as irrelevant to this
3 litigation and not proportional to the needs of the case.

4 Notwithstanding the aforementioned objections, Responding party expressly
5 reserves the right to supplement, clarify, revise, or correct any or all responses to
6 the request, and to assert additional objections or privileges, in one or more
7 subsequent supplemental response(s) in accordance with the time period for
8 exchanging expert reports set by the Court. Discovery and investigation are
9 continuing.

10
11 REQUEST FOR PRODUCTION NO. 234:

12 A copy of the "Inmate Injury-Illness Report 6-15-13 (Booking #3557770)
13 180305".

14
15 RESPONSE TO REQUEST NO. 234:

16 Objection. This Request has previously been asked and responded to for
17 Request No. 42. This request seeks premature expert discovery. It also seeks
18 production of documents which are protected from disclosure pursuant to the
19 official information privilege. Responding Party further objects to this Request as
20 irrelevant to this litigation and not proportional to the needs of the case.

21 Notwithstanding the aforementioned objections, Responding party expressly
22 reserves the right to supplement, clarify, revise, or correct any or all responses to
23 the request, and to assert additional objections or privileges, in one or more
24 subsequent supplemental response(s) in accordance with the time period for
25 exchanging expert reports set by the Court. Discovery and investigation are
26 continuing.

27
28 ///

1 REQUEST FOR PRODUCTION NO. 235:

2 A copy of the "Inmate Search Info (Booking #3557770) 180305".

3 RESPONSE TO REQUEST NO. 235:

4 Objection. This Request has previously been asked and responded to for
5 Request No. 43. This request seeks premature expert discovery. It also seeks
6 production of documents which are protected from disclosure pursuant to the
7 official information privilege. Responding Party further objects to this Request as
8 irrelevant to this litigation and not proportional to the needs of the case.

9 Notwithstanding the aforementioned objections, Responding party expressly
10 reserves the right to supplement, clarify, revise, or correct any or all responses to
11 the Request, and to assert additional objections or privileges, in one or more
12 subsequent supplemental response(s) in accordance with the time period for
13 exchanging expert reports set by the Court. Discovery and investigation are
14 continuing.

17 REQUEST FOR PRODUCTION NO. 236:

18 A copy of "Inmate Total Movement History 1-25-13 - 3-12-13 (Booking
19 #3441717) 180305".

20 RESPONSE TO REQUEST NO. 236:

21 Objection. This Request has previously been asked and responded to for
22 Request No. 44. This request seeks premature expert discovery. It also seeks
23 production of documents which are protected from disclosure pursuant to the
24 official information privilege. Responding Party further objects to this Request as
25 irrelevant to this litigation and not proportional to the needs of the case.

27 Notwithstanding the aforementioned objections, Responding party expressly
28 reserves the right to supplement, clarify, revise, or correct any or all responses to

1 the Request, and to assert additional objections or privileges, in one or more
2 subsequent supplemental response(s) in accordance with the time period for
3 exchanging expert reports set by the Court.

4

5 **REQUEST FOR PRODUCTION NO. 237:**

6 A copy of the "Inmate Total Movement History 5-12-13 -5-9-14 (Booking
7 #3557770) 180305".

8 **RESPONSE TO REQUEST NO. 237:**

9 Objection. This Request has previously been asked and responded to for
10 Request No. 45. This request seeks premature expert discovery. It also seeks
11 production of documents which are protected from disclosure pursuant to the
12 official information privilege. Responding Party further objects to this Request as
13 irrelevant to this litigation and not proportional to the needs of the case.

14

15 Notwithstanding the aforementioned objections, Responding party expressly
16 reserves the right to supplement, clarify, revise, or correct any or all responses to
17 the Request, and to assert additional objections or privileges, in one or more
18 subsequent supplemental response(s) in accordance with the time period for
19 exchanging expert reports set by the Court.

20

21 **REQUEST FOR PRODUCTION NO. 238:**

22 A copy LACSD Manual regarding the operation of the Los Angeles County Jail
23 during the time period between January 28, 2013 and May 9, 2014.

24 **RESPONSE TO REQUEST NO. 238:**

25 Objection. This Request is vague, ambiguous, overbroad, and seeks
26 production of documents which are protected from disclosure pursuant to the
27 official information privilege. Responding Party further objects to this Request as
28 irrelevant to this litigation and not proportional to the needs of the case. This

1 Request seeks documents that contain confidential and proprietary business
2 information.

3

4 REQUEST FOR PRODUCTION NO. 239:

5 A copy of the "LASD IRC Intake Screening_5-10-13 (Booking #3557770)
6 180305".

7 RESPONSE TO REQUEST NO. 239:

8 Objection. This Request has previously been asked and responded to for
9 Request No. 47. This request seeks premature expert discovery. It also seeks
10 production of documents which are protected from disclosure pursuant to the
11 official information privilege. Responding Party further objects to this Request as
12 irrelevant to this litigation and not proportional to the needs of the case. This
13 Request seeks documents that contain confidential and proprietary business
14 information.

15

16 Notwithstanding the aforementioned objections, Responding party expressly
17 reserves the right to supplement, clarify, revise, or correct any or all responses to
18 the Request, and to assert additional objections or privileges, in one or more
19 subsequent supplemental response(s) in accordance with the time period for
20 exchanging expert reports set by the Court.

21

22 REQUEST FOR PRODUCTION NO. 240:

23 A copy of the "LASD IRC Issued No Bail Want for Arrest (3-8-13) 180305".

24 RESPONSE TO REQUEST NO. 240:

25 Objection. This Request has previously been asked and responded to for
26 Request No. 48. This request seeks premature expert discovery. It also seeks
27 production of documents which are protected from disclosure pursuant to the
28 official information privilege. Responding Party further objects to this Request as

1 irrelevant to this litigation and not proportional to the needs of the case. This
2 Request seeks documents that contain confidential and proprietary business
3 information.

4 Notwithstanding the aforementioned objections, Responding party expressly
5 reserves the right to supplement, clarify, revise, or correct any or all responses to
6 the Request, and to assert additional objections or privileges, in one or more
7 subsequent supplemental response(s) in accordance with the time period for
8 exchanging expert reports set by the Court. Discovery and investigation are
9 continuing.

11 REQUEST FOR PRODUCTION NO. 241:

12 A copy of the "246. 5-23-021 Chaplain Passes_Rev01 1613".

14 RESPONSE TO REQUEST NO. 241:

15 Objection. This Request has previously been asked and responded to for
16 Request No. 49. This request seeks premature expert discovery. It also seeks
17 production of documents which are protected from disclosure pursuant to the
18 official information privilege. Responding Party further objects to this Request as
19 irrelevant to this litigation and not proportional to the needs of the case. This
20 Request seeks documents that contain confidential and proprietary business
21 information.

22 Notwithstanding the aforementioned objections, Responding party expressly
23 reserves the right to supplement, clarify, revise, or correct any or all responses to
24 the Request, and to assert additional objections or privileges, in one or more
25 subsequent supplemental response(s) in accordance with the time period for
26 exchanging expert reports set by the Court.

1 REQUEST FOR PRODUCTION NO. 242:

2 A copy of the "Crime Report and supplemental report - 05-12-13 180301 ".

3 RESPONSE TO REQUEST NO. 242:

4 Objection. This Request has previously been asked and responded to for
5 Request No. 50. This request seeks premature expert discovery. It also seeks
6 production of documents which are protected from disclosure pursuant to the
7 official information privilege. Responding Party further objects to this Request as
8 irrelevant to this litigation and not proportional to the needs of the case. This
9 Request seeks documents that contain confidential and proprietary business
10 information.

11 Notwithstanding the aforementioned objections, Responding party expressly
12 reserves the right to supplement, clarify, revise, or correct any or all responses to
13 the Request, and to assert additional objections or privileges, in one or more
14 subsequent supplemental response(s) in accordance with the time period for
15 exchanging expert reports set by the Court.

18 REQUEST FOR PRODUCTION NO. 243:

19 All Document(s) showing Defendants Teresa Malone, and Deputy Shah's 5
20 completion of training consistent and in compliance with the Corrections Standard
21 Authority under Minimum Standards for Local Detention Facilities, Title 15-Crime
22 Prevention and Corrections Division 1, Chapter 1, Subchapter 4.

23 RESPONSE TO REQUEST NO. 243:

24 Objection. This Request has previously been asked and responded to for
25 Request No. 53. This request seeks premature expert discovery. This Request is
26 also vague, ambiguous, and overbroad. Responding Party further objects to this
27 Request as irrelevant to this litigation and not proportional to the needs of the case.

1 This Request seeks documents that contain confidential and proprietary business
2 information.

3 Notwithstanding the aforementioned objections, Responding party expressly
4 reserves the right to supplement, clarify, revise, or correct any or all responses to
5 the Request, and to assert additional objections or privileges, in one or more
6 subsequent supplemental response(s) in accordance with the time period for
7 exchanging expert reports set by the Court. Discovery and investigation are
8 continuing.

9

10 **REQUEST FOR PRODUCTION NO. 244:**

11 Any and all documents reviewed by Dr. Alan L. Shabo in connection with his
12 work on this case.

13

14 **RESPONSE TO REQUEST NO. 244:**

15 Objection. This Request has previously been asked and responded to for
16 Requests Nos. 56 and 57. This request seeks premature expert discovery.
17 Responding Party further objects to this request, whether broadly or more narrowly
18 construed, in that it seeks production of documents protected by the work product
19 doctrine because they are communications between attorney and expert.
20 Responding Party further objects to this Request as irrelevant to this litigation and
21 not proportional to the needs of the case.

22 Notwithstanding the aforementioned objections, Responding party expressly
23 reserves the right to supplement, clarify, revise, or correct any or all responses to
24 the Request, and to assert additional objections or privileges, in one or more
25 subsequent supplemental response(s) in accordance with the time period for
26 exchanging expert reports set by the Court. Discovery and investigation are
27 continuing.

1 REQUEST FOR PRODUCTION NO. 245:

2 Any and all documents reviewed by Dr. Gary M. Vilke in connection with his
3 work on this case.

4 RESPONSE TO REQUEST NO. 245:

5 Objection. This Request has previously been asked and responded to for
6 Requests Nos. 85 and 86. This request seeks premature expert discovery.
7 Responding Party further objects to this request, whether broadly or more narrowly
8 construed, in that it seeks production of documents protected by the work product
9 doctrine because they are communications between attorney and expert.
10 Responding Party further objects to this Request as irrelevant to this litigation and
11 not proportional to the needs of the case.

12 Notwithstanding the aforementioned objections, Responding party expressly
13 reserves the right to supplement, clarify, revise, or correct any or all responses to
14 the request, and to assert additional objections or privileges, in one or more
15 subsequent supplemental response(s) in accordance with the time period for
16 exchanging expert reports set by the Court.

17 REQUEST FOR PRODUCTION NO. 246:

18 The COLA's policies, procedures and guidelines regarding Minimum Standards for
19 Local Detention Facilities, Title 15-Crime Prevention and Corrections Division 1,
20 Chapter 1, Subchapter 4.

21 RESPONSE TO REQUEST NO. 246:

22 Objection. This Request has previously been asked and responded to for
23 Request No. 54. This request seeks premature expert discovery. It also seeks
24 production of documents which are protected from disclosure pursuant to the
25 official information privilege. This Request is also vague, ambiguous, overbroad,
26 and compound. Responding Party further objects to this Request as irrelevant to
27
28

1 this litigation and not proportional to the needs of the case. This Request seeks
2 documents that contain confidential and proprietary business information.

3 Notwithstanding the aforementioned objections, Responding party expressly
4 reserves the right to supplement, clarify, revise, or correct any or all responses to
5 the request, and to assert additional objections or privileges, in one or more
6 subsequent supplemental response(s) in accordance with the time period for
7 exchanging expert reports set by the Court. Discovery and investigation are
8 continuing.

9

10 **REQUEST FOR PRODUCTION NO. 247:**

11 Any and all complaints or allegations of, in substance, deliberate indifference of an
12 inmate or pretrial detainee receiving medical treatment, aid or attention that was
13 initiated against Defendant Deputy Shah.

14

15 **RESPONSE TO REQUEST NO. 247:**

16 Objection. This Request is also vague, ambiguous, and overbroad as to
17 scope and substance. Responding Party further objects to this Request as calling
18 for a legal conclusion, irrelevant to this litigation, and not proportional to the needs
19 of the case. This Request seeks documents that contain confidential information
20 and invades the right of privacy held by individuals who have been or are
21 incarcerated in Los Angeles County Jails.

22

23 **REQUEST FOR PRODUCTION NO. 248:**

24 Any and all complaints or allegations of, in substance, deliberate indifference to an
25 inmate or pretrial detainee receiving medical treatment, aid or attention that was
26 initiated against Defendant Teresa Malone.

27

28 ////

1 **RESPONSE TO REQUEST NO. 248:**

2 Objection. This Request is vague, ambiguous, and overbroad as to scope and
3 substance. Responding Party further objects to this Request as calling for a legal
4 conclusion, irrelevant to this litigation, and not proportional to the needs of the
5 case. This Request seeks documents that contain confidential information and
6 invades the right of privacy held by Defendants' employees and individuals who
7 have been or are incarcerated in Los Angeles County Jails.

8

9 **REQUEST FOR PRODUCTION NO. 249:**

10 Any and all medical records for Daniel Cohen that are in the possession, custody
11 and/or control of the COLA.

12 **RESPONSE TO REQUEST NO. 249:**

13 Objection. Plaintiff's medical records were previously requested for Request
14 No. 129 served on January 2, 2020. Defendants responded to said request on May
15 4, 2020. Defendants object to providing multiple responses to Plaintiff's medical
16 records as an improper attempt to obtain further responses. This Request is also
17 vague, ambiguous, overbroad, and seeks production of documents which are
18 protected from disclosure pursuant to the official information privilege.

19 Responding Party further objects to this Request as irrelevant to this litigation and
20 not proportional to the needs of the case. Additionally, this Request is unduly
21 burdensome because numerous documents may tangentially refer to this Request.

22

23 **REQUEST FOR PRODUCTION NO. 250:**

24 All complaints initiated by Daniel Cohen while incarcerated between January 28,
25 2013 and May 9, 2014.

26 ////

27

1 **RESPONSE TO REQUEST NO. 250:**

2 Objection. This Request has previously been asked and responded to for
3 Request No. 130. This Request is also vague and ambiguous. Responding Party
4 further objects to this Request as irrelevant to this litigation. This Request creates
5 an undue burden on Responding Party to produce documents that are not
6 proportional to the needs of the case.

7

8 **REQUEST FOR PRODUCTION NO. 251:**

9 Any and all documents prepared by Defendant Deputy Shah explaining why he
10 cancelled any of Daniel Cohen's medical appointments.

11 **RESPONSE TO REQUEST NO. 251:**

12 Objection. This Request has previously been asked and responded to for
13 Requests Nos. 148 and 151. This Request violates the right of privacy held by
14 Defendants' employees in regards to their employment/personnel records. The
15 Request is also vague, ambiguous, overbroad, and seeks production of documents
16 which are protected from disclosure pursuant to the official information privilege.
17 This Request creates an undue burden on Responding Party to produce documents
18 that are not proportional to the needs of the case.

20

21 **REQUEST FOR PRODUCTION NO. 252:**

22 Any and all documents regarding Defendant Deputy Shah's decision to cancel any
23 of Daniel Cohen's medical appointments.

24 **RESPONSE TO REQUEST NO. 252:**

25 Objection. This Request is duplicative and has previously been responded to
26 for Requests Nos. 149 and 152. This Request seeks to invade the privacy rights of
27 Defendants' employees in regards to their employment/personnel records. The
28 Request is also vague, ambiguous, overbroad, and seeks production of documents

1 which are protected from disclosure pursuant to the official information privilege.
2 Responding Party further objects to this Request as irrelevant to this litigation. This
3 Request creates an undue burden on Responding Party to produce documents that
4 are not proportional to the needs of the case.

5

6 **REQUEST FOR PRODUCTION NO. 253:**

7 Any and all photographs depicting any facial injuries of Daniel Cohen between
8 January 28, 2013 and May 9, 2014.

9 **RESPONSE TO REQUEST NO. 253:**

10 Objection. This Request is vague, ambiguous, and overbroad as to scope and
11 substance. The Request also seeks production of documents which are protected
12 from disclosure pursuant to the official information privilege. Responding Party
13 further objects to this Request as irrelevant to this litigation and not proportional to
14 the needs of the case.

15

16 **REQUEST FOR PRODUCTION NO. 254:**

17 Any and all injury report(s) regarding Daniel Cohen between January 28, 2013 and
18 May 9, 2014.

19 **RESPONSE TO REQUEST NO. 254:**

20 Objection. This Request is vague, ambiguous, overbroad as to scope and
21 substance. The Request also seeks production of documents which are protected
22 from disclosure pursuant to the official information privilege. Responding Party
23 further objects to this Request as irrelevant to this litigation and not proportional to
24 the needs of the case.

25

26

27 ////

28

1 REQUEST FOR PRODUCTION NO. 255:

2 A copy of the Los Angeles County Sheriffs Department Manual excerpts regarding
3 the investigation of inmate or pretrial detainee complaints of violence by other
4 inmates or pretrial detainees between January 28, 2013 and May 9, 2014.

5 RESPONSE TO REQUEST NO. 255:

6 Objection. This Request has previously been asked and responded to for
7 Request No. 238. This Request is vague, ambiguous, overbroad, and seeks
8 production of documents which are protected from disclosure pursuant to the
9 official information privilege. Responding Party further objects to this Request as
10 irrelevant to this litigation and not proportional to the needs of the case. This
11 Request seeks documents that contain confidential and proprietary business
12 information.

14 REQUEST FOR PRODUCTION NO. 256:

15 A copy of the Los Angeles County Sheriffs Department Manual excerpts regarding
16 rendering medical treatment or aid to inmates or pretrial detainees between January
17 28, 2013 and May 9, 2014.

19 RESPONSE TO REQUEST NO. 256:

20 Objection. This Request has previously been asked and responded to for
21 Request No. 238. This Request is vague, ambiguous, overbroad, and seeks
22 production of documents which are protected from disclosure pursuant to the
23 official information privilege. Responding Party further objects to this Request as
24 irrelevant to this litigation and not proportional to the needs of the case. This
25 Request seeks documents that contain confidential and proprietary business
26 information.

27 ////

1 REQUEST FOR PRODUCTION NO. 257:

2 A copy of the Los Angeles County Sheriffs Department Manual excerpts regarding
3 scheduling medical visits for inmates or pretrial detainees at outside
4 medical facilities between January 28, 2013 and May 9, 2014.

5 RESPONSE TO REQUEST NO. 257:

6 Objection. This Request has previously been asked and responded to for
7 Request No. 238. This Request is vague, ambiguous, overbroad, and seeks
8 production of documents which are protected from disclosure pursuant to the
9 official information privilege. Responding Party further objects to this Request as
10 irrelevant to this litigation and not proportional to the needs of the case. This
11 Request seeks documents that contain confidential and proprietary business
12 information.

14 REQUEST FOR PRODUCTION NO. 258:

15 A copy of the Los Angeles County Sheriffs Department Manual excerpts
16 regarding transporting inmates or pretrial detainees to outside medical facilities
17 between January 28, 2013 and May 9, 2014.

19 RESPONSE TO REQUEST NO. 258:

20 Objection. This Request has previously been asked and responded to for
21 Request No. 238. This Request is vague, ambiguous, overbroad, and seeks
22 production of documents which are protected from disclosure pursuant to the
23 official information privilege. Responding Party further objects to this Request as
24 irrelevant to this litigation and not proportional to the needs of the case. This
25 Request seeks documents that contain confidential and proprietary business
26 information.

27 ////

1 REQUEST FOR PRODUCTION NO. 259:

2 A copy of the Los Angeles County Sheriffs Department Manual excerpts
3 regarding the cancellation of an inmate's or pretrial detainee's medical appointment
4 at an outside medical facility between January 28, 2013 and May 9, 2014.

5 RESPONSE TO REQUEST NO. 259:

6 Objection. This Request has previously been asked and responded to for
7 Request No. 238. This Request is vague, ambiguous, overbroad, and seeks
8 production of documents which are protected from disclosure pursuant to the
9 official information privilege. Responding Party further objects to this Request as
10 irrelevant to this litigation and not proportional to the needs of the case. This
11 Request seeks documents that contain confidential and proprietary business
12 information.

14 REQUEST FOR PRODUCTION NO. 260:

15 A copy of the Los Angeles County Sheriffs Department Manual excerpts regarding
16 the COLA's process of making housing assignments based upon an 12 inmate's or
17 pretrial detainee's medical condition(s) or medical need(s) between January 28,
18 2013 and May 9, 2014.

20 RESPONSE TO REQUEST NO. 260:

21 Objection. This Request has previously been asked and responded to for
22 Request No. 238. This Request is vague, ambiguous, overbroad, and seeks
23 production of documents which are protected from disclosure pursuant to the
24 official information privilege. Responding Party further objects to this Request as
25 irrelevant to this litigation and not proportional to the needs of the case. This
26 Request seeks documents that contain confidential and proprietary business
27 information.

1 REQUEST FOR PRODUCTION NO. 261:

2 A copy of the Los Angeles County Sheriffs Department Manual excerpts regarding
3 the prescription of medication to an inmate based upon an inmate's or pretrial
4 detainee's medical condition(s) or medical need(s) between January 28, 2013 and
5 May 9, 2014.

6 RESPONSE TO REQUEST NO. 261:

7 Objection. This Request has previously been asked and responded to for
8 Request No. 238. This Request is vague, ambiguous, overbroad, and seeks
9 production of documents which are protected from disclosure pursuant to the
10 official information privilege. Responding Party further objects to this Request as
11 irrelevant to this litigation and not proportional to the needs of the case. This
12 Request seeks documents that contain confidential and proprietary business
13 information.

15 REQUEST FOR PRODUCTION NO. 262:

16 Any and all documents regarding any medication(s) prescribed to Daniel Any and
17 all documents regarding any medication(s) prescribed to Daniel Cohen by any
18 COLA/LACSD employee between January 28, 2013 and May 9, 2014.

20 RESPONSE TO REQUEST NO. 262:

21 Objection. Plaintiff's medical records were previously requested for Request
22 No. 129 served on January 2, 2020. Defendants responded to said request on May
23 4, 2020. Defendants object to providing multiple responses to Plaintiff's medical
24 records as an improper attempt to obtain further responses. This Request is also
25 vague, ambiguous, overbroad, and seeks production of documents which are
26 protected from disclosure pursuant to the official information privilege.
27 Responding Party further objects to this Request as irrelevant to this litigation and
28

1 not proportional to the needs of the case. Additionally, this Request is unduly
2 burdensome because numerous documents may tangentially refer to this Request.
3

4 Date: September 28, 2021

5 **IVIE McNEILL WYATT
PURCELL & DIGGS**

6 By: /s/ Ade' Jackson

7 **W. KEITH WYATT
ADE' JACKSON
Attorneys for Defendants
COUNTY OF LOS ANGELES**

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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California; I am over the age of 18 and not a party to the within action; my business address is 444 South Flower Street, Suite 1800, Los Angeles, California, 90071.

On September 29, 2021, I served the foregoing document described as **DEFENDANT COUNTY OF LOS ANGELES' RESPONSES TO PLAINTIFF DANIEL COHEN'S REQUEST FOR PRODUCTION OF DOCUMENTS (SET THREE)** on the interested parties in this action by placing true copies thereof enclosed in sealed envelopes addressed on attached Service List:

- [] **BY PERSONAL DELIVERY:** I caused such envelope to be delivered by hand to the addressee.
- [X] **BY EMAIL TRANSMISSION:** I caused such DOCUMENT to be transmitted to the addressee. See Service List below
- [] **BY MAIL:** I caused such envelope to be deposited in the mail at Los Angeles, California, with first class postage thereon fully prepaid. I am readily familiar with the business practice for collection and processing of correspondence for mailing. Under that practice, it is deposited with the United States Postal Service on that same day, at Los Angeles, California, in the Ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postage cancellation date or postage meter date is more than one (1) day after the date of deposit for mailing in affidavit.
- [] **BY FAXSIMILE TRANSMISSION:** I caused such documents to be transmitted to the offices of the addressee via facsimile machine, on the date specified above. The facsimile machine telephone number I used, 213-489-0552, was in compliance with Rule 2003(3) and the transmission was reported as complete without error. Pursuant to Rule 2008(e), I caused a copy of the transmission report to be properly issued by the transmitting facsimile machine.
- [] **BY GSO OVERNIGHT DELIVERY:** I am “readily familiar” with the firm’s practice of collection and processing correspondence for Federal Express. Under that practice, it would be picked up by a representative on that same day, in the ordinary course of business and would be delivered the next business day.

Executed on **September 29, 2021**, Los Angeles, California.

/s/M. Christina Munoz
M. CHRISTINA MUNOZ

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SERVICE LIST

3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 Jonathan Corbett, Esq. 958 N. Western Ave. #765 Hollywood, CA 90029 Phone: (310) 684-3870 FAX: (310) 675-7080 E-mail: jon@corbettrights.com As of 6/11/21	Attorney for Plaintiff Daniel Cohen
Robert S. Brown, Esq. ROBERT STANFORD BROWN, APC 714 W. Olympic Blvd., Suite 450 Los Angeles, CA 90015 Tel: (213) 745-6300 FAX: (213) 261-3906 stanfordbrown@gmail.com	